

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
MIDDLE DISTRICT OF ALABAMA**

**SUSAN SHIROCK DEPAOLA,  
IN HER OFFICIAL CAPACITY  
OF TRUSTEE FOR THE  
BANKRUPTCY ESTATE OF  
STEVEN L. PRICE,**

**Plaintiff,**

**V.**

**STEPHEN L. PRICE and STARLA  
WATSON PRICE FRAZER,**

## Defendants.

**V.**

**BADDLEY & AURO, LLC, and THOMAS  
E. BADDLEY, SUSAN S. DEPAOLA,**

### Counter Defendants.

## **BADDLEY & MAURO, L.L.C.'S RESPONSE**

Comes now, Baddley & Mauro, LLC (hereinafter “Baddley”), by and through its attorney, and files this response to the pending Motion to Withdraw the Reference and states to wit:

1. Baddley takes no position as to the Motion to Withdraw the reference.
2. Baddley denies any and all statements contained within the Defendant Starla Watson Price Frazer's affidavit that would state, tend to state, aver, tend to aver or otherwise argue or infer that Baddley tried to buy, offered to buy and/or offered to purchase the stock from her at any time. Baddley denies that Frazer requested to be added as a proper plaintiff in the state court litigation against Tiffin Motor Homes.

Baddley reserves any and all rights to refute any and all other statements made by Frazer should this Honorable Court grant Frazer's Motion to Withdraw the Reference.

Respectfully submitted this the 21<sup>th</sup> day of June, 2006.

/s/ André M. Toffel  
André M. Toffel, as Attorney for the  
Baddley & Mauro, LLC

OF COUNSEL:  
ANDRÉ M. TOFFEL, P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above pleading has been served on the following electronically and by placing a copy of same in the U.S. Mail, first-class postage prepaid and properly addressed on this the 21<sup>th</sup> day of June, 2006.

Teresa R. Jacobs US Bankruptcy Administrator One Church Street Montgomery, Alabama 36104	David B. Anderson AmSouth-Harbert Plaza, Ste 1900 1901 6 <sup>th</sup> Ave North Birmingham, Alabama 35203
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/s/ André M. Toffel  
Of Counsel